

1 Abraham J. Colman (SBN 146933)
acolman@reedsmith.com
2 Felicia Y. Yu (SBN 193316)
fyu@reedsmith.com
3 Raymond Y. Kim (SBN 251210)
rkim@reedsmith.com
4 Jack J. Gindi (SBN 293739)
Email: jgindi@reedsmith.com
5 Reed Smith LLP
355 South Grand Avenue
6 Suite 2900
Los Angeles, CA 90071-1514
7 Telephone: +1 213 457 8000
Facsimile: +1 213 457 8080
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9 Attorneys for Defendant
Nationstar Mortgage, LLC

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13 ROBERT JORDAN, SEAN HALBERT, DANA
14 SKELTON, and VANESSA RUGGLES
individually and on behalf of all others similarly
15 situated,

16 Plaintiffs,

17 vs.

18 NATIONSTAR MORTGAGE, LLC, a Delaware
19 limited liability company,

20 Defendant.

21 Case No.: 3:14-cv-00787-WHO

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**DEFENDANT NATIONSTAR
MORTGAGE, LLC'S RESPONSE TO
PLAINTIFF'S MOTION TO APPOINT
INTERIM CO-LEAD CLASS COUNSEL**

26 Date: Wednesday, August 13, 2014

27 Time: 2:00 p.m.

28 Dept.: Courtroom 2 – 17th Floor

Complaint Filed: February 21, 2014
Consolidated Amended Complaint Filed:
June 23, 2014

1 On July 3, 2014, Plaintiffs Robert Jordan, Sean Halbert, Dana Skelton, and Vanessa Ruggles
 2 (“Plaintiffs”) filed a Motion to Appoint Interim Co-Lead Class Counsel under Federal Rule of Civil
 3 Procedure 23(g)(2) (the “Motion”). In the Motion, Plaintiffs request that the court appoint Jay
 4 Edelson and Steven Woodrow of Edelson PC as the interim “co-lead counsel,” and Michael Sousa,
 5 Doug Campion, and Matthew English of the Law Offices of Michael P. Sousa, Law Offices of Doug
 6 Campion, and Law Offices of Matthew G. English respectively, as the interim “official Executive
 7 Committee.” *See* Docket Item No. # 32, at 4:21-24.

8 Defendant Nationstar Mortgage, LLC (“Nationstar”) does not join in the Motion, and
 9 contrary to Plaintiffs’ assertion in the Motion, never agreed “not [to] oppose the proposed leadership
 10 structure.” However, although it is unclear why an appointment of interim class counsel is necessary
 11 at this juncture, Nationstar does not oppose the Motion. Nationstar reserves its right to oppose any
 12 motion for class certification brought by Plaintiffs on all grounds, including the adequacy of
 13 Plaintiffs’ counsel or the appointed interim counsel to represent the class, at the appropriate time.
 14 Nationstar also reserves its right to challenge the final appointment of class counsel in this action,
 15 and to the extent other putative class actions are filed based on the Telephone Consumer Protection
 16 Act, Nationstar reserves its right to communicate with counsel in those actions.

17 DATED: July 17, 2014 REED SMITH LLP
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19 By: /s/ Raymond Y. Kim
 20 Abraham J. Colman
 21 Felicia Y. Yu
 22 Raymond Y. Kim
 23 Jack J. Gindi
 24 Attorneys for Defendant
 25 Nationstar Mortgage, LLC
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PROOF OF SERVICE

I am a resident of the State of California, over the age of eighteen years, and not a party to the within action. I am employed in the office of a member of the bar of this court at whose direction the service was made. My business address is REED SMITH LLP, 355 S. Grand Avenue, Suite 2900, Los Angeles, CA 90017.

On July 17, 2014, I electronically filed the following document(s) with the Clerk of the Court using the CM/ECF system, which sent electronic notification of such filing to all other parties appearing on the docket sheet, as listed below.

**DEFENDANT NATIONSTAR MORTGAGE, LLC'S RESPONSE TO PLAINTIFF'S
MOTION TO APPOINT INTERIM CO-LEAD CLASS COUNSEL**

<p>Mark Eisen EDELSON PC 555 West Fifth Street, 31st Floor Los Angeles, CA 90013 Telephone: (213) 533-4100 Facsimile: (213) 947-4251 E-Mail: meisen@edelson.com</p> <p>ATTORNEYS FOR PLAINTIFFS AND THE PUNTATIVE CLASSES</p>	<p>Steven L. Woodrow Megan Lindsey EDELSON PC 999 West 18th Street, Suite 3000 Denver, CO 80202 Telephone: (303) 357-4878 Facsimile: (303) 446.9111 E-Mail: swoodrow@edelson.com E-Mail: mlindsey@edelson.com</p> <p>ATTORNEYS FOR PLAINTIFFS AND THE PUNTATIVE CLASSES</p>
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I declare under penalty of perjury under the laws of the United States that the above is true and correct. Executed on July 17, 2014, at Los Angeles, California.

/s/Patty Keen

Patty Keen